

MARK D. LITVACK #183652  
mark.litvack@pillsburylaw.com  
JEFFREY D. WEXLER #132256  
jeffrey.wexler@pillsburylaw.com  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
725 South Figueroa Street, 36<sup>th</sup> Floor  
Los Angeles, CA 90017-5524  
Telephone: (213) 488-7100  
Facsimile No.: (213) 629-1033

Attorneys for Plaintiff  
THE BOARD OF TRUSTEES OF THE  
LELAND STANFORD JUNIOR UNIVERSITY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

THE BOARD OF TRUSTEES OF THE  
LELAND STANFORD JUNIOR UNIVERSITY,

Plaintiff,

vs.

CHIANG FANG CHI-YI, an individual;  
CHIANG HSIAO-CHANG, an individual;  
CHIANG YO-MEI, an individual; CHIANG  
TSAI HUI-MEI, an individual; CHIANG YO-  
SUNG, an individual; CHIANG YO-LAN, an  
individual; CHIANG YO-BO, an individual;  
CHIANG YO-CHANG, an individual; CHIANG  
YO-CHING, an individual; CHUNGYAN  
CHAN, an individual; ACADEMIA  
HISTORICA, an entity of The Republic of  
China; CHIANG HSIAO-YEN, an individual;  
CHIANG HUI-LAN, an individual; CHIANG  
HUI-YUN, an individual; CHIANG WAN-AN,  
an individual, and CHIU JU-HSUEH, an  
Individual.

Defendants.

Case No. 5:13-cv-04383-BLF-VKD

**PLAINTIFF THE BOARD OF  
TRUSTEES OF THE LELAND  
STANFORD JUNIOR UNIVERSITY'S  
NOTICE OF COMPLIANCE WITH  
ORDER DIRECTING TRANSFER OF  
DEPOSITS [Dkt. 404]**

Judge: Hon. Beth Labson Freeman

1 Interpleader plaintiff The Board of Trustees of The Leland Stanford Junior University  
2 (“Stanford”) hereby gives the Court notice that it has complied with the Court’s July 11, 2023 Order  
3 [Dkt. 404] directing Stanford to transfer to interpleader defendant Academia Historica possession of  
4 certain diaries and papers of Chiang Kai-shek and Chiang Ching-kuo (the “Deposit”) within 60 days  
5 of the date of entry of that Order, *i.e.*, by September 11, 2023 and as clarified by the Court’s Order  
6 of August 21, 2023 [Dkt. 412].

7 Stanford offered to make the Deposit available for pick-up by Academia Historica on  
8 September 7, 2023. *See* Declaration of Eric Wakin, ¶ 3. On September 5, 2023, Academia Historica  
9 informed Stanford that it would like to pick up the Deposit on September 11, 2023. *See id.*  
10 Stanford accommodated this request, and on September 11, 2023, a courier hired by Academia  
11 Historica picked up the Deposit in its entirety from Stanford. *See id.* To the best of Stanford’s  
12 knowledge, the materials picked up by Academia Historica’s courier included all of the materials  
13 that were in Stanford’s possession that were deposited with it by Elizabeth Chiang (Chiang Fang  
14 Chi-yi) pursuant to the Deposit Agreement dated January 10, 2015. *See id.*, ¶ 4.

15  
16 Respectfully submitted,

17 Dated: September 11, 2023

18 MARK D. LITVACK  
19 JEFFREY D. WEXLER  
20 PILLSBURY WINTHROP SHAW  
21 PITTMAN LLP

22 By: /s/ Mark D. Litvack  
23 Mark D. Litvack  
24 Attorneys for Plaintiff The Board of Trustees of  
25 Leland Stanford Junior University  
26  
27  
28

Docket No. CV-13-04383-BLF-HRL  
PROOF OF SERVICE

I am employed in the State of California, in the office of a member of the bar of this Court, at whose direction the service is made. I am over the age of eighteen years, and not a party to the within action. My email and business address is kelly.saunders@pillsburylaw.com and Pillsbury Winthrop Shaw Pittman LLP, 725 South Figueroa Street, 36<sup>th</sup> Floor, Los Angeles, CA 90017-5524. On September 11, 2023, I served the document titled **PLAINTIFF THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY'S NOTICE OF COMPLIANCE WITH ORDER DIRECTING TRANSFER OF DEPOSITS [Dkt. 404]** on the following party in this action as follows:

**See Attached Service List.**

- ☒ **(BY MAIL)** I caused each envelope, with postage thereon fully prepaid, to be placed in the United States mail at Los Angeles, CA. I am readily familiar with the practice of Pillsbury Winthrop Shaw Pittman LLP for collection and processing of correspondence for mailing, said practice being that in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection.
- ☐ **(BY FACSIMILE)** The above-referenced document is transmitted by facsimile transmission and the transmission was reported as complete and without error to the numbers listed above.
- ☒ **(BY EMAIL TRANSMISSION)** The above-referenced document is transmitted via electronic transmission to the persons at the electronic-email addresses indicated on the attached Service List.
- ☐ **(BY PERSONAL SERVICE)** I delivered to an authorized courier or driver authorized by \_\_\_\_\_ to receive documents to be delivered on the same date. A proof of service signed by the authorized courier will be filed forthwith.
- ☐ **(BY OVERNIGHT COURIER)** I am readily familiar with the practice of Pillsbury Winthrop Shaw Pittman LLP for collection and processing of correspondence for overnight delivery and know that the document(s) described herein will be deposited in a box or other facility regularly maintained by \_\_\_\_\_ for overnight delivery.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11<sup>th</sup> day of September, 2023, at Anaheim, California.

  
 \_\_\_\_\_  
 Kelly Saunders

**Service List**

Amy Hsiao-chang Yu  
2905 Buena Vista Way  
Berkeley, CA 94708-2017

Via e-mail only  
[ayu@pobox.com](mailto:ayu@pobox.com)

**Via U.S. Mail**

Chiang Yo-bo  
1F No 9 Lane 9  
Lin Sun North Road  
Taipei, 100  
Taiwan

Chiang Yo-chang  
1F No 9 Lane 9  
Lin Sun North Road  
Taipei, 100  
Taiwan

Chiang Yo-ching  
1F No 9 Lane 9  
Lin Sun North Road  
Taipei, 100  
Taiwan

Chiang Yo-lan  
1F No 9 Lane 9  
Lin Sun North Road  
Taipei, 100  
Taiwan

Chiang Yo-sung  
1F No 9 Lane 9  
Lin Sun North Road  
Taipei, 100  
Taiwan

Chiang Fang Chi-yi  
1F No 9 Lane 9  
Lin Sun North Road  
Taipei, 100  
Taiwan

Chiang Tsai Hui-mei  
1F No 9 Lane 9  
Lin Sun North Road  
Taipei, 100  
Taiwan